



December 11, 2019

BY EMAIL TO [barone.stan@epa.gov](mailto:barone.stan@epa.gov)

Stan Barone, Ph.D.  
Office of Pollution Prevention and Toxics (7403M)  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

Re: Request for Extension of Public Comments on N-Methylpyrrolidone; Draft Toxic Substances Control Act (TSCA) Risk Evaluation [EPA-HQ-OPPT-2019-0236; FRL-10001- 87]

Dear Dr. Barone:

On behalf of the Semiconductor Industry Association (SIA), I'm writing to request an extension of time to file comments in the above-captioned matter.

SIA submitted comments to the Peer Review proceedings for the NMP draft Risk Evaluation and offered remarks during the public meeting portion of the Peer Review. SIA intends to supplement its initial comments concerning the draft Risk Evaluation after SIA has the opportunity to more closely review and interpret the Agency's methodology for estimating worker exposures in semiconductor manufacturing operations. Our supplemental comments will likely have a bearing on any determinations the Agency reviewers will make with respect to the potential risks to semiconductor manufacturing facility workers under the conditions of use. Unfortunately, to the date of this correspondence, SIA has been unable to gain access to information we seek concerning the Agency's modeling methods and the tools that were used which EPA managers advised during the Peer Review proceedings would be made available to SIA and other interested parties.

SIA has made several written and verbal requests to EPA for background information needed to conduct an analysis under the PBPK model, and we are still waiting for that information. Moreover, SIA reiterated our request during the meeting of EPA's Science Advisory Committee on Chemicals (SACC), members of the SACC supported this request, and EPA informed the SACC they were providing the requested model and code to the industry. In the absence of this information, we are unable to verify the model and properly analyze the draft Risk Evaluation and the tentative conclusions reached by EPA.

SIA strongly disagrees with EPA's conclusion in the draft Risk Evaluation which, notwithstanding data and analyses in the Agency's possession, erroneously over estimated worker exposure to NMP in the semiconductor industry. We reiterate with this correspondence our request that EPA promptly release the requested information which SIA needs to objectively evaluate EPA's draft findings and we ask for an additional 60-day period to prepare our comments which should commence running only after the information we seek is made available by EPA.

Thank you for your attention to our request. Please contact me at 202-446-1709 or [disaacs@semiconductors.org](mailto:disaacs@semiconductors.org) if you have any questions about this request.

Sincerely,

A handwritten signature in black ink, appearing to be "Disaacs", written in a cursive style.

Cc: Alexandra Dunn, AA, OCSPP  
Jeff Morris, OD/OPPT  
Joel Wolf, DD/CCD